

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ERIN WILSON, *individually and on
behalf of others similarly situated,*

Plaintiff,

v.

McNamara Chiropractic LLC,

Defendant.

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CIVIL ACTION NO.
2:25-cv-00201-SCJ

**DEFENDANT MCNAMARA CHIROPRACTIC LLC’S UNOPPOSED
MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE
RESPOND TO CLASS ACTION COMPLAINT OF ERIN WILSON**

Come now Defendant McNamara Chiropractic LLC (“Defendant”) by and through undersigned counsel, files this Unopposed Motion for Extension of Time to Answer or Otherwise Respond to the Class Action Complaint of Plaintiff Erin Wilson. In support thereof Defendant states as follows:

1. Upon information and belief, Plaintiff Erin Wilson, individually and on behalf of others similarly situated (“Plaintiff”), filed the instant class action on July 9, 2025. [Doc. No. 1].

2. Plaintiff served the Class Action Complaint on an authorized representative of Defendant on July 17, 2025. [Doc. No. 6].

3. Accordingly, Defendant’s current deadline to respond to Plaintiff’s Class Action Complaint was August 7, 2025.

4. Defendant and its counsel require a brief extension of time to evaluate the factual allegations stated in the Class Action Complaint, research Defendant's records, and determine the circumstances involved.

5. Thus, Defendant respectfully requests an extension of time, through and including August 31, 2025, to submit its Answer or responsive pleading.

6. Counsel for Defendant consulted with Plaintiff's counsel regarding this Motion. Plaintiff consents to this Motion and the relief requested.

7. A proposed Order granting the relief requested in this Motion is attached hereto.

WHEREFORE, Defendant, with the consent of Plaintiff, respectfully requests that its Unopposed Motion for Extension of Time to answer, plead or otherwise respond to Plaintiff's Class Action Complaint be granted and that the time to do so be extended through and including August 31, 2025. A proposed order has been attached for the consideration by the Clerk of Court pursuant to N.D. Ga. LR 6.1.

Respectfully submitted this 8th day of August 2025.

JACKSON LEWIS P.C.

/s/ Eric R. Magnus

Eric R. Magnus

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CERTIFICATION

In accordance with LR 5.1(C), N.D. Ga., I hereby certify that this document has been prepared in 14 point, Times New Roman font. I also certify that Defendant has complied with the attorney-conference requirement of LR 7.1(B), N.D. Ga., and Plaintiff consents to this Motion and the relief requested.

/s/ Eric R. Magnus

Eric R. Magnus

Georgia Bar No. 801405

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CERTIFICATE OF SERVICE

I certify that on August 8, 2025, I electronically filed the foregoing
**MOTION TO EXTEND TIME TO ANSWER CLASS ACTION
COMPLAINT** with the Clerk of the Court using the CM/ECF system which will
automatically send email notification of such filing to the following attorneys of
record:

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